

## **The complaint**

Mr C complains that Starling Bank Limited failed to identify that he had gambling problems and as a result he lost considerable sums of money on gambling.

## **What happened**

Mr C says that particularly in the period between September and December 2025 he spent over £20,000 on gambling. This was mainly through use of overseas online gambling websites. He also borrowed money from family and sent money to friends to gamble for him.

Mr C first complained to Starling in late December 2025. He had been using Starling's gambling block which he turned on and off during periods of gambling but this was not effective to block his particular gambling. He feels that if Starling had intervened and offered support earlier this could have prevented him from gambling.

Starling said that Mr C hadn't made it aware at any time before December 2025, and there was no indication from his account history, that he was suffering from gambling related harm. It offered him support and made him aware of other organisations that could help. But it didn't consider that it was responsible for his losses.

On referral to the Financial Ombudsman Service, our Investigator didn't uphold Mr C's complaint.

Mr C didn't agree, and the matter has been passed to me for an Ombudsman's consideration.

## **What I've decided – and why**

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

Mr C has raised a number of points and although I may not mention every point raised, I've considered everything he has said. My decision focuses on the issues at the heart of the complaint. I don't intend any discourtesy by this. It just reflects the informal nature of our service.

First of all, I fully understand that Mr C has suffered mental health issues and linked to these he had a gambling addiction. I know it would have been a difficult thing for him to recognise and to seek help for. And I know that he has taken steps to do this.

As our Investigator has explained, although Starling has now recorded him as being a vulnerable customer, needing help particularly with his finances, gambling in itself wouldn't automatically classify someone as vulnerable. If, as in this case, Mr C didn't tell Starling of his gambling problems then I have to consider whether there were signs from his account activity which might have led Starling to intervene earlier. I have to bear in mind that bank accounts are not manually reviewed so there would have to be some form of alert that might have caused Starling to review the account. This would include indications of financial

difficulties like regularly exceeding an arranged overdraft, or missing payments like direct debits. Or the gambling payments themselves being identified as possibly fraudulent. Or unusual account activity.

I believe Mr C had an arranged overdraft with Starling. And he did use this in the months of January to March 2025 and then during September to December 2025 inclusive. But I don't believe he exceeded this and keeping within an overdraft is not something that would be flagged. I haven't identified any missed payments. Whilst Mr C has told us that he used loans which he took out himself and also a loan his parents took out for him, again, without other factors such as missed payments, these wouldn't be identified as indicating financial problems.

So far as I can see the gambling payments were not to recognised UK betting companies but to overseas websites linked to casinos with names that might be more identified with general sport. I understand that none of these payments were flagged as being possibly fraudulent.

This brings us on to unusual account activity. Mr C believes for the period in question that the multiple gambling payments, and the multiple transfers into his account from another bank account should have alerted Starling to his unusual account activity. It is the case that he spent a lot more on gambling during this period. But I do note that the merchant codes (MCCs) used by those companies wouldn't have identified the payments as gambling. And I don't think the activity went on long enough to start being flagged.

However as it's arguable that such a large increase in spending might have alerted Starling, I have considered whether it's likely that an earlier intervention from Starling might have caused him to stop gambling.

I appreciate Mr C's point that this is to some extent speculative. But if, as he argues he would not have made the gambling losses and seeks recompense in respect of those losses I do have to consider the point. I have to make my decision based on what I think is most likely to have happened.

As Mr C has experienced with Starling, once he advised it of his gambling problems it did offer support. That support depends very much on the customer accepting it. The bank could address help with financial issues and offer its gambling blocks (which Mr C was already using). For actual help to stop it is appropriate that Starling referred him to outside agencies.

When considering Mr C's position, I have noted that he did make use of Starling's gambling block. As he didn't seek advice on how to use it, Starling does set out on its app and its website the limitations of the block. It applies to card payments, not bank transfers. In Mr C's case he used overseas websites that used MCCs which were not recognised by the block.

I believe Mr C was also registered with GamStop but this too would not have blocked those particular payments. He turned the gambling block on and off from February 2025 onwards, though again use of the block wouldn't necessarily indicate financial problems caused by gambling. And whilst I recognise that he had mental health issues which he tells us impaired his judgement, I do have to consider that any intervention would have been in the form of a letter or an alert inviting him to contact Starling. It wouldn't have been able to take any steps without his consent. I bear in mind that Mr C used websites the payments to which he should reasonably have been aware were not stopped by the gambling block. In light of that I think it is most likely that any earlier alert from Starling would not have prevented his gambling losses.

So overall I don't think that Starling could reasonably have been expected to have been

aware that Mr C was having financial problems caused by gambling, before he told it. And I think, even if it had intervened earlier, that wouldn't have likely stopped Mr C from continuing gambling.

### **My final decision**

For the reasons set out above, I don't uphold the complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr C to accept or reject my decision before 7 May 2026.

Ray Lawley  
**Ombudsman**